



2026  
CONSUMER  
SAFETY  
MANUAL

## Disclaimer

This Consumer Safety Manual is intended to provide guidance on the policies and procedures used by the YMCA of the Black Hills (the “YMCA” or “Y”) to promote the safety and well-being of children, youth, and vulnerable adults in our programs. It is for informational and training purposes only and does not constitute a contract or create any legal rights or obligations between the organization, its employees, volunteers, or participants.

While these procedures reflect our current standards and best practices, no manual can identify every potential risk or prevent all incidents of abuse, and these guidelines may be updated or revised at any time as laws, standards, or organizational needs change.

All employees and volunteers must comply with applicable federal, state, and local laws, including the organization’s mandatory reporting requirements. If there is any conflict between this manual and applicable law, the law takes precedence.

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# Section 1.00 Commitment to Consumer Abuse Prevention

## 1.01 Consumer Abuse Prevention & Response

The following policies are intended to assist employees and volunteers in making appropriate decisions about interactions with consumers in our care. Compliance with this Consumer Safety Manual is a condition of employment and volunteer service. Questions regarding these guidelines, or behaviors not addressed here, should be directed to the Consumer Protection Committee (CPC).

The YMCA of the Black Hills provides our consumers with the highest quality services available. We are committed to creating an environment for consumers that is safe, nurturing, empowering, and that promotes growth and success.

All employees and volunteers must submit to a criminal background check prior to beginning employment/service and must be in compliance with YMCA of the Black Hills criminal background standards. The YMCA maintains a zero-tolerance policy for abuse of any kind, against consumers, employees/volunteers, or 3rd party participants. Any substantiated allegation of abuse will result in immediate termination of employment/service and full cooperation with law enforcement.

Employees and volunteers are required to report suspected or known abuse or inappropriate behavior involving consumers to their department director and appropriate authorities in accordance with YMCA policy. All reports will be taken seriously, and the YMCA will fully cooperate with any investigation conducted by law enforcement or other authorities.

Abuse, mistreatment, or sexual activity among consumers/members within the organization is strictly prohibited. Conduct by consumers/members that rises to the level of abuse, mistreatment, or sexual activity will result in intervention or disciplinary action, up to and including, dismissal from the program.

All employees and volunteers are required to cooperate fully with any internal investigation conducted by the YMCA of the Black Hills and any external investigation conducted by law enforcement or other authorities. Failure to cooperate fully in an investigation or to follow reporting procedures may result in disciplinary action, up to and including, termination.

# Section 2.00 Definitions & Consumer Interactions

## 2.01 General Definitions

### *Administrator:*

Any employee who:

- ❖ Oversees the day-to-day performance of staff; and
- ❖ Has completed required child abuse prevention, supervision, and screening/selection training;
- ❖ Has hiring/firing authority; and
- ❖ Is designated as a member of the YMCA of the Black Hills “Big Team” as outlined on the official Organizational Chart.

### *Consumer:*

- ❖ Any child under the age of eighteen (18) or vulnerable adult utilizing YMCA of the Black Hills facility or participating in YMCA of the Black Hills programs or services.

### *Consumer Protection Committee (CPC):*

- ❖ The CPC is a designated group of organizational leaders responsible for oversight of abuse risk management and consumer safety. Responsibilities include:
- ❖ Responding to any allegation or incident of sexual misconduct, molestation, or abuse;
- ❖ Analyzing incident data on an annual basis and using this information to identify areas of improvement;
- ❖ Coordinating abuse prevention training for the organization;
- ❖ Defining screening procedures for individuals with access to consumers;
- ❖ Ensuring the organization responds to drift from organizational policies and standards; and
- ❖ Communicating the following to the governing body:
- ❖ Potential exposures and/or drift from organizational policies and standards;
- ❖ Pending litigation related to abuse risk;
- ❖ High-level incident data and allegations of abuse; and
- ❖ The organization’s abuse risk management efforts.

Members serving on the CPC include the:

- ❖ Chief Operations Officer: (605) 719-5090
- ❖ Human Resources Director: (605) 719-5089
- ❖ Curriculum, Accreditation, and Training Specialist: (605) 718-9622 ext 5233

### *High-Risk Consumers:*

- ❖ Consumers who, due to age, unique needs, behavioral challenges, medical conditions, or other identified factors, require increased supervision or specific safeguards to reduce the risk of abuse, neglect, or harm.

### *Member:*

- ❖ Any individual who has completed the YMCA of the Black Hills membership process, including payment of applicable fees, and is authorized to access YMCA facilities, programs, or services in accordance with YMCA policies.

### *One-on-One Interaction:*

- ❖ Any situation in which an employee or volunteer is alone with a consumer, or where the interaction is not observable and interruptible by others.

### *Supervisor:*

Any employee who:

- ❖ Oversees the day-to-day performance of staff; and
- ❖ Has completed child abuse prevention and supervision training.

*Vulnerable Adult:*

- ❖ A person sixty-five (65) years of age or older who is unable to protect themselves from abuse due to age or a mental or physical condition, or
- ❖ An adult (eighteen (18) years or older) with a disability as defined in § 22-46-1 South Dakota Codified Law.

*Unique Needs:*

- ❖ Physical, emotional, behavioral, cognitive, medical, or developmental conditions that require additional accommodations, supervision, support, or modifications to ensure a consumer's safety, participation, and inclusion in YMCA of the Black Hills programs or activities.

## 2.02 Red Flag Behavior

Red flag behavior refers to any conduct that violates professional boundaries, weakens safeguards, or creates conditions where abuse could occur. These behaviors may be subtle, repeated, or escalating and require intervention regardless of intent. Employees/volunteers should always be looking out for any "red flag" behavior between consumers and adults, in order to identify any possible instances of abuse. Below is a list of potential red flag behaviors to be aware of:

- ❖ Any violation of the organization's abuse prevention policies
- ❖ Seeking unauthorized private time or one-on-one time with consumers
- ❖ Seeing or visiting with a consumer outside of scheduled programming
- ❖ Buying gifts for individual consumers
- ❖ Sending unauthorized electronic communications through text messaging, social media, online gaming, etc. in violation of the organization's electronic communication policy
- ❖ Making suggestive comments to consumers
- ❖ Showing favoritism towards a consumer or type of consumer
- ❖ Consumers disclosing that an employee or volunteer makes them feel uncomfortable
- ❖ Isolating a consumer from peers or trusted adults
- ❖ Inconsistent or unpredictable discipline
- ❖ Any form of inappropriate touch as listed in Section 2.03
- ❖ Any form of inappropriate verbal interactions as listed in Section 2.04
- ❖ Violations of the Consumer Safety Manual, Employee Handbook, or Volunteer Handbook

## 2.03 Abuse Definitions

*Physical Abuse:*

- ❖ Injury that is intentionally inflicted upon consumers.

*Sexual Abuse:*

- ❖ Any contact of a sexual nature that occurs between a consumer and an adult or between two consumers. This includes any activity which is meant to arouse or gratify the sexual desires of the adult or the other consumer.

### *Emotional Abuse:*

- ❖ Mental or emotional injury to a consumer that results in an observable and material impairment in the consumer's growth, development, or psychological effectiveness.

### *Neglect:*

- ❖ The failure to provide for a consumer's basic needs or the failure to protect a consumer from harm.

## 2.04 Bullying Definitions

Bullying is aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power or strength. Bullying can take on various forms, including:

### *Physical Bullying:*

- ❖ When one person engages in physical force against another person, such as by hitting, punching, pushing, kicking, pinching, or restraining another.

### Verbal bullying:

- ❖ When someone uses their words to hurt another, such as by belittling or calling another hurtful names.

### *Nonverbal or Relational Bullying:*

- ❖ When one person manipulates a relationship or desired relationship to harm another person. This includes social exclusion, friendship manipulation, or gossip. This type of bullying also includes intimidating another person by using gestures.

### *Cyberbullying*

- ❖ The intentional and overt act of aggression toward another person by way of any technological tool, such as email, instant messages, text messages, digital pictures or images, social media postings, or website postings (including blogs).
- ❖ Cyberbullying can involve:
  - ❖ Sending mean, vulgar, or threatening messages or images.
  - ❖ Posting sensitive, private information about another person.
  - ❖ Pretending to be someone else in order to make that person look bad.
  - ❖ Intentionally excluding someone from an online group.
- ❖ Hazing – an activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers that person regardless of that person's willingness to participate.

### *Sexualized Bullying*

- ❖ When bullying involves behaviors that are sexual in nature. Examples of sexualized bullying behaviors include sexting, bullying that involves exposures of private body parts, and verbal bullying involving sexualized language or innuendos.

## 2.05 Physical Interactions

Our Y's physical contact policy promotes a positive, nurturing environment while protecting consumers, employees, and volunteers. Our Y encourages appropriate physical contact with consumers and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by employees/volunteers towards consumers in the Y's programs will result in disciplinary action, up to and including termination of employment/service. The Y's policies for appropriate and inappropriate physical interactions include but are not limited to:

Appropriate Physical Interactions	Inappropriate Physical Interactions
<ul style="list-style-type: none"> <li>• Contact initiated by the consumer such as:</li> <li>• Side hugs</li> <li>• Shoulder-to-shoulder or “temple” hugs</li> <li>• Pats on the shoulder or back</li> <li>• Handshakes</li> <li>• High-fives and hand slapping</li> <li>• Pats on the head when culturally appropriate</li> <li>• Touching hands, shoulders, and arms</li> <li>• Arms around shoulders</li> <li>• Holding hands (with young children in escorting situations)</li> </ul>	<ul style="list-style-type: none"> <li>• Full-frontal hugs</li> <li>• Kisses</li> <li>• Showing affection in isolated areas or while one-on-one</li> <li>• Wrestling</li> <li>• Piggyback rides</li> <li>• Tickling</li> <li>• Allowing a consumer to cling to an employee’s or volunteer’s leg</li> <li>• Allowing consumers, older than kindergarten, to sit on an employee/volunteer’s lap</li> <li>• Any type of massage given by or to a consumer outside of accepted and documented medical treatment</li> <li>• Any form of affection that is unwanted by the consumer</li> <li>• Touching bottom, chest, or genital areas that is outside authorized and documented personal care assistance</li> </ul>

## 2.06 Verbal Interaction

Employees/volunteers are prohibited from speaking to those in our care in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.

Employees/volunteers must not initiate sexually oriented conversations. Employees/volunteers are not permitted to discuss their own sexual activities with those in our care.

Our Y’s policies for appropriate and inappropriate verbal interactions are:

Appropriate Verbal Interactions	Inappropriate Verbal Interactions
<ul style="list-style-type: none"> <li>• Positive reinforcement</li> <li>• Appropriate jokes</li> <li>• Encouragement</li> <li>• Praise</li> </ul>	<ul style="list-style-type: none"> <li>• Name-calling</li> <li>• Bullying</li> <li>• Discussing sexual encounters or in any way involving those in our care in the personal problems or issues of employees/volunteers</li> <li>• Secrets (“Don’t tell your parents”)</li> <li>• Cursing</li> <li>• Off-color or sexual jokes</li> <li>• Shaming or belittling</li> <li>• Harsh language that may frighten, threaten or humiliate a person</li> <li>• Derogatory remarks about a person or their family</li> <li>• Compliments relating to physique or body development</li> </ul>

## 2.07 One-on-One Interaction

One-on-one interactions may occur as part of this organization’s programming under authorized circumstances. The purpose of this policy is to ensure the organization clearly communicates expectations for employees/volunteers and gives examples of appropriate behavior when one-on-one interactions may occur. In those situations where one-on-one interactions are authorized, employees/volunteers should observe the following guidelines to limit the risk of abuse or false allegations of abuse:

- ❖ Meet consumers in a public place where you are in full view of others.
- ❖ Avoid physical affection during one-on-one interactions. If unavoidable, ensure physical and verbal interactions align with the Y’s established policies and are limited to the task at hand.
- ❖ If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by.
- ❖ Inform other employees/volunteers that you are alone with a consumer and encourage them to randomly drop in or pass by the interaction.
- ❖ To the extent possible, ensure one-on-one interactions occurring behind closed doors are scheduled in advance or are communicated with your direct supervisor or associate director.
- ❖ Ensure one-on-one interactions are documented, especially if behind closed doors. Keep documentation of these meetings (such as in shared calendar, case notes, etc.).
- ❖ Document and immediately report any unusual incidents, including disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted.

## 2.08 Off-Site Interactions

Research shows many cases of organizational abuse occur off-site and outside of regularly scheduled activities. Allowing contact outside of regularly scheduled activities may put employees, volunteers, consumers, and our Y at increased risk. This policy offers various options for managing the risk of abuse and false accusations arising from contact outside the Y’s regularly scheduled programming. Examples of contact outside of regularly scheduled program activities:

- ❖ Babysitting arrangements
- ❖ Tutoring

- ❖ Private lessons/coaching
- ❖ Mentorship
- ❖ Social interactions between employee's or volunteer's children and children served by the Y:
- ❖ Playdates and birthday parties
- ❖ Sleepovers
- ❖ Overnight trips and vacations
- ❖ Rides to/from organization or extracurricular activities and events
- ❖ Attending public events in a shared community (like graduation, sports events, religious ceremonies)
- ❖ Continued contact with consumers after a consumer's participation in a program has ended

Appropriate Outside Contact	Inappropriate Outside Contact
<ul style="list-style-type: none"> <li>• Taking groups on an outing</li> <li>• Attending sporting activities with a group</li> <li>• Attending functions at the home, with parents/caregivers present</li> <li>• Carpool rides to practice or games, with parental permission</li> <li>• Consumer mentoring programs</li> <li>• Babysitting with express permission from department director and completed waiver</li> </ul>	<ul style="list-style-type: none"> <li>• One-on-one off-site interaction with a consumer</li> <li>• Visiting a consumer in their home, without another adult present</li> <li>• Entertaining one consumer in the home of employee/volunteer</li> <li>• A lone consumer spending the night with employee/volunteer</li> </ul>

This organization strongly encourages employees/volunteers to refrain from outside contact with consumers with which they do not have a pre-existing familial or social relationship (i.e., children are friends at school, families attend same religious institution). However, if interactions with consumers outside of regularly scheduled program activities are part of programming or otherwise unavoidable, this organization offers the following guidelines:

- ❖ If there is a pre-existing social or familial relationship, ensure proper boundaries are drawn by the employee/volunteer while in organization programming.
  - For example, if Emily Employee is best friends with Consumer Charlie's mom such that Consumer Charlie calls Emily by her first name in social settings, ensure Emily communicates to Consumer Charlie that while in organization programming Consumer Charlie needs to call Emily, Ms. Employee. This helps reinforce the boundary and makes clear that Emily's role as an employee/volunteer is different than her role as Consumer Charlie's mom's best friend and the relationship should reflect that.
  - If Emily has children that are friends with Consumer Charlie, she can give Consumer Charlie a ride if her children are also in the car. Even in that interaction, make sure Consumer Charlie is sitting in the back seat. The same rules apply for trips to McDonald's/the park/etc. that are occurring as part of the preexisting social relationship.
- ❖ To increase transparency, consider texting or emailing an administrator when these interactions like transportation and social outings occur.
  - If Emily allows other young consumers to spend the night with her children, ensure administrators are notified to increase transparency and consider keeping the number of consumers at the gathering small (1-3). Ensure that rules prohibiting one-on-one interactions apply in this setting and that consumers are not going into Emily's bedroom or vice versa.
  - If consumers are going to join Emily and her children on a vacation or other trip, make sure the Rule of Three applies so there are no one-on-one interactions. Consider requiring Emily to get some sort of written confirmation from the consumer's parents/guardians that they have allowed their child to go (can be as simple as a text).

- ❖ A pre-existing relationship form (i.e. if someone has a familial or social relationship with a consumer or will be hiring them to babysit/housesit/tutor/etc.) is required to be on file prior to the program start date. This helps ensure transparency and also protects the employee/volunteer from rumors.
  - For example, if Coach Jones has hired Morgan to babysit and someone sees Morgan leaving Coach Jones' house at 10 pm on a Friday night, it is much easier for the employee/volunteer and organizational leadership to respond to those concerns if they have been notified that interaction was going to take place. It is not a foolproof system, as abuse can certainly still happen in the situation given, but it adds an extra layer of protection for employees, volunteers, and consumers.

## 2.09 Electronic Communication Guidelines

To ensure transparency, safety, and appropriate boundaries, all electronic communication between employees/volunteers and consumers must follow the guidelines below.

### *General Requirements*

- ❖ All electronic communication must be transparent and professional.
- ❖ A parent/guardian must be included on all electronic communications involving a consumer.
- ❖ Communication must occur through YMCA-approved organizational email accounts or approved platforms.
- ❖ The YMCA "Rule of Three" must be observed at all times. For example, at least two YMCA employees/volunteers or one YMCA employee/volunteer and a parent/guardian must be included on any electronic communication with a consumer (e.g., group texts or emails).
- ❖ Direct, private, one-to-one electronic messaging between employees/volunteers and consumers is strictly prohibited.

### *Permitted Purposes for Electronic Communication*

Electronic communication with consumers (with parent/guardian and required staff included) is permitted only for the following purposes:

- ❖ Program-related information (e.g., schedules, locations, transportation details)
- ❖ Pre-program or pre-game information and reminders
- ❖ Changes to schedules, delays, or cancellations
- ❖ General program updates or announcements
- ❖ Clarification of participation requirements or logistics
- ❖ Safety-related notifications or urgent program needs

### *Prohibited Communication*

- ❖ Personal or social conversations unrelated to YMCA programs
- ❖ Private or direct messaging between an employee/volunteer and a consumer
- ❖ Communication through personal email accounts, personal phone numbers, or unapproved platforms
- ❖ Any communication that is secretive, exclusive, or not accessible to parents/guardians and YMCA leadership

## Section 3.00 Monitoring & Supervision

### 3.01 General Guidelines for Monitoring and Supervision

When employees/volunteers are adequately supervised, potential offenders are less likely to act on their impulses because they face detection. When consumers are adequately supervised, they too are less likely to engage in inappropriate interactions with others. Thereafter, the YMCA programming areas must be monitored, particularly out-of-the-way locations or locations that might permit an offender undue access to, or privacy with, a consumer. The Y requires supervisors and employees to follow all established monitoring and supervision procedures as outlined below, including bathrooms, locker rooms and changing areas, playground and recreational activities, and transportation. Effective supervision and monitoring require that a variety of methods be used frequently, at both scheduled and random times.

#### *Facility Monitoring*

Building architecture can increase or mitigate the risk of an incident or accident. Because most incidents of sexual behavior occur in private, the extent to which privacy is managed, risk is managed. The YMCA will systematically identify facility locations that allow for unnecessary privacy or limit line of sight supervision, and utilize a formalized system to manage these identified architectural risks, which includes:

- ❖ Ensuring employees and volunteers are aware of these locations
- ❖ Ensuring unused rooms, offices, and closets remain locked;
- ❖ Ensuring visibility in rooms without windows; and
- ❖ Ensuring employees routinely walk through out of the way locations.

Department employees are required to conduct walkthroughs of their specific YMCA facility area at least every hour. Employees must document the walkthrough and any observations utilizing the Building Safety Checklist.

#### *Checking Visitors into a Facility*

When any non-employee or volunteer enters the facility during operational hours, they must check in with the front desk or receptionist.

When possible, the YMCA will create a single point of entry and exit in the facility.

If there is more than one entrance or exit, the YMCA will ensure these other points of access are consistently monitored.

#### *General Supervision Procedures*

- ❖ Administrative and Supervisory Visits to Consumer Programs: Consumer supervisors and administrators will regularly visit all consumer programs to ensure that all activities are well-managed and that consumer policies are observed by all in attendance.
- ❖ Ratios: Each program will follow the ratio requirements that satisfy the goals of the program and the design of the program area.
- ❖ Mixed Age Groups: In most incidents involving one consumer abusing another consumer, the consumers are from different age groups. Each program is responsible for establishing specific guidelines for additional monitoring and supervision of activities that involve consumers from different age groups. Employees/volunteers must be aware that close line of sight supervision is required when monitoring programs that mix age groups.

Ultimately, consumers must be supervised at all times, regardless of age or developmental level. The key is to remember that consumers can be supervised directly in structured activities and indirectly when they are in authorized areas.

### 3.02 Monitoring High Risk Activities

Bathrooms and locker rooms are high risk locations for sexual activity between consumers, and adult offenders can use the privacy afforded in bathrooms, locker rooms, and during shower time to abuse a consumer. Consequently, bathrooms, locker rooms, and shower time require close monitoring, and these practices must be carefully managed. Locker rooms and shower time also present increased risk, because consumers may be nude or partially nude and consumers may engage in horseplay.

### *Bathroom Activities*

When supervising restroom use, employees/volunteers should first quickly scan the bathroom before allowing consumers to enter.

For “Group Bathroom Breaks”:

- ❖ Employees/volunteers should take groups of three or more consumers to the bathroom – following the “rule of three” or more.
- ❖ If the bathroom only has one stall, only one consumer should enter the restroom while the others wait outside with the employee/volunteer.
- ❖ If there are multiple stalls, only send in as many consumers as there are stalls.
- ❖ Minimize consumers of different ages using the bathroom at the same time.
- ❖ Employees/volunteers stand outside the bathroom door but remain within earshot.
- ❖ Prohibit employees/volunteers from using the bathroom at the same time as consumers.
- ❖ If assisting young consumers in the stalls, the employee/volunteer should keep the stall door open.

For single use restrooms:

- ❖ Require consumers to ask permission to use the bathroom.
- ❖ Require all employees to frequently check bathrooms.

### *Diapering, Toileting, and Personal Care Assistance*

Personal care may involve a variety of activities, such as diapering, toileting, bathing, and dressing. It is important to follow personal care procedures for both the protection of the consumer, as well as for the protection of employees from false allegations.

Personal care procedures, regardless of the setting in which the consumer receives services, should take into consideration the age and development of the consumer as well as the consumer’s particular needs for assistance. Ideally, the degree to which employees would be expected to assist in these vulnerable/high-risk activities for each consumer should be documented in the individual consumer’s case, behavior, service, or treatment plan.

As much as able (based on age and ability of consumer), employees should use verbal prompts to guide the consumer in self-assisting tasks. If a consumer needs more assistance, then an alternative could be for the employee or volunteer to put their hand on top of the consumer’s hand during the personal care activity. The primary goal when providing personal care or hygiene-related activities is to ensure there is guidance and documentation that outlines when and under what circumstances employees and volunteers may engage in these activities with consumers (beyond identified medical care needs).

The following are additional procedures to consider:

- ❖ Always use the least intrusive method possible. For example: allow the consumer to do as much as they can by themselves.
- ❖ Avoid staring at a consumer’s body.
- ❖ Document any observed injury, disclosure of abuse, or any interactions that may have been misinterpreted.

- ❖ Avoid giving physical affection. If physical affection is necessary, limit it to handshakes or high fives. Avoid more intimate forms of physical affection such as hugs.
- ❖ Allow for informal monitoring as long as it does not infringe on the consumer's right to privacy. For example, if possible, keep the bathroom or bedroom door cracked so a passersby can see the adult assisting but not the consumer.
- ❖ Make every attempt to have employees of the same gender as that of the consumer to provide personal care.

#### Diapering

- ❖ When possible, changing tables must be placed in an open area where adult actions can be observed by others.
- ❖ Diapers should only be changed when at least two adults, or individuals, are present. In instances when only one adult is present (e.g. opening and closing childcare classrooms), adults must always be visible on camera.
- ❖ Written documentation of diaper changes is required.
- ❖ Employees/volunteers must inform their direct supervisor and associate director (if applicable) if they notice anything out of the ordinary or concerning while changing the consumer's diaper.
- ❖ Employees and volunteers are required to know and follow all licensing requirements having to do with diapering.

#### Toileting

- ❖ Employees/volunteers are required to stand in the doorway with the door ajar while the consumer uses the restroom.
- ❖ If employees or volunteers must enter the restroom to assist a consumer, the door to the restroom must remain open.
- ❖ When possible, send in only one consumer at a time. When possible, send in only as many consumers as there are stalls.

#### *Locker Room Activities*

- ❖ Employees/volunteers must stand within earshot of the area within the locker room when in use by consumers.
- ❖ Employees/volunteers must intermittently and briefly check the area in use inside the locker room, so users know the locker room is monitored.
- ❖ Discourage the use of locker rooms by consumers of different ages at the same time.
- ❖ The use of locker room horseplay such as towel snapping is prohibited.

#### *Shower Activities*

- ❖ Employees/volunteers and consumers must shower at different times. Create shower schedules that will permit supervision of the consumers in designated program location, while employees/volunteers shower.
- ❖ While consumers shower, at least one employee should stand in the shower area doorway and within earshot of the consumers.
- ❖ Ensure only one consumer is in each shower (shower curtains that do not go all the way to the floor are encouraged, so employees can easily see how many consumers are in each shower stall).

#### *Pool Activities*

There is always an increased risk of abuse during water activities, due to water coverage, clothing changes, and partial nudity. Risk is managed through adequate supervision and following the below procedures:

#### Monitoring During Swim Lessons

- ❖ Ensure instructors teach swim lessons in open, viewable swim areas under the supervision of other employees.
- ❖ Monitor interactions with consumers that follow the YMCA's guidelines for appropriate and inappropriate physical interactions.
- ❖ Require instructors, when possible, to keep their hands above water and visible to others.
- ❖ Require instructors, when assisting a child during the lessons, to explain out loud where they will touch the child – "I am going to put my hand under your back to help you float."
- ❖ When possible, encourage parents/guardians to observe swimming lessons.

#### Monitoring Pool Deck/Lounge Areas

- ❖ Ensure all entrances and exits to the pool deck are appropriately and regularly monitored.
- ❖ Designate specific employees (Instructors, Junior Lifeguards, etc.) responsible for monitoring the pool deck and lounge areas (other than lifeguards). Active supervision of these areas is always critical.
- ❖ Monitor consumers to ensure they are following the YMCA's guidelines for appropriate interactions (including physical interactions, verbal interactions, and electronic communications).
- ❖ Have a plan of action for responding to any deck changing (individuals changing on the pool deck and not in the appropriate locker room or changing area).

If a Junior Lifeguard observes red flag behavior during monitoring procedures, they should immediately notify an employee over the age of 18.

#### Pool Restroom Expectations

- ❖ Designated staff members are responsible for monitoring entry points and public restroom usage to ensure the safety, privacy, and well-being of all consumers.
- ❖ Restroom stalls are limited to single occupancy. The sole exception is when a parent or legal guardian is assisting a consumer who is unable to independently use the restroom or change clothing.
- ❖ All consumers under the age of 18 must be supervised by a parent or legal guardian while using multi-stall public restrooms. In instances where a minor is not accompanied, staff shall conduct a sweep of the restroom area to confirm that the consumer is not alone or unsupervised and shall continue monitoring the area until the consumer exits.
- ❖ Appropriate signage shall be posted to communicate restroom expectations. Routine restroom sweeps will be conducted by staff to maintain a safe, respectful, and appropriately supervised environment.

#### *Transition Times and Free Times*

Transition times and free-choice times (or free times) pose a high risk for incidents because during these times, employees/volunteers may not be assigned a particular group of consumers to supervise. To decrease the risk of incidents, follow the following procedures:

- ❖ All consumers must always remain in line-of-site of employees/volunteers.
- ❖ Employee-to-consumer ratio will be pre-determined by supervisors, associate directors (if applicable), and licensing standards (if applicable) and shared with employees.
- ❖ Narrow geographic boundaries will be set in the program areas.
- ❖ All employees will be assigned specific areas to supervise ("zone monitoring").
- ❖ Specific bathroom procedures will be followed (see Bathroom Activities).
- ❖ Periodic roll calls will be completed for each age group.
- ❖ Periodic check-ins and sweeps of the entire activity area will be completed by supervisors.

#### *Managing Quiet Time and Naptime*

- ❖ Employees/volunteers and consumers do not sit or lie on anyone's bed, cot/mat, or lay in another's sleeping

bag.

- ❖ Employees/volunteers should encourage consumers to draw an imaginary line around their sleeping space and encourage them to report violations to an employee or volunteer.
- ❖ Employees/volunteers will not leave consumers alone during naptime.
- ❖ Employees/volunteers will not let consumers share a sleeping cot/mat, blanket, or sleeping bag.
- ❖ Employees/volunteers should pay attention to who is sleeping next to whom to avoid any unnecessary conflict or inappropriate behavior.
- ❖ Employees/volunteers should arrange sleeping areas with as much space as possible between each consumer.
- ❖ Consumers must only nap in areas visible by employees/volunteers.
- ❖ Employees/volunteers must keep the room sufficiently lit so that they can easily observe all consumers.
- ❖ Employees/volunteers should always have a line-of-sight view of consumers at all times.
- ❖ The YMCA of the Black Hills does not require consumers to fall asleep during rest/naptime. Employees/volunteers can encourage rest but are prohibited from using threatening language, bribery, or punishment for consumers who do not sleep during rest time.

### *Playground Activities*

- ❖ Consumers are to always remain in line-of-site of employees/volunteers.
- ❖ Narrow geographic boundaries will be set for the areas.
- ❖ Specific instructions on how to monitor barriers of supervision (such as storage sheds, playhouses, tunnels, and shrubs) will be established.
- ❖ Specific bathroom procedures will be followed (see Bathroom Activities).
- ❖ Periodic roll calls will be completed for each age group.
- ❖ Periodic check-ins and sweeps of the entire activity area will be completed by supervisors.

### *Transportation Activities*

Transporting consumers may increase the risk of abuse or false allegations of abuse because employees/volunteers may be alone with a consumer or may make unauthorized stops with consumers. In addition, transportation activities may provide time for unsupervised consumers to engage in consumer-to-consumer sexual activity. To minimize the threat of these issues:

- ❖ Written parent permission is required from all consumers on the trip. Employees take these permission forms and medical releases with them on the trip.
- ❖ Employees have a list of the consumers on the trip. The employees take roll call when boarding the bus, when leaving the bus, periodically throughout the trip, and then again when boarding the bus.
- ❖ Employee-to-consumer ratios are pre-defined. Do not count the driver in the supervision ratio.
- ❖ Employees are required to sit in seats that permit maximum supervision.
- ❖ Mixed age groups are discouraged from sitting together.
- ❖ When possible, high-risk consumers are seated by themselves or near an employee/volunteer.
- ❖ Employees, volunteers, and drivers are prohibited from making unauthorized stops (such as personal stops or stopping unnecessarily when consumers are loaded on the bus.).
- ❖ Documentation of any unusual occurrences is required.

When public transportation is used:

- ❖ In addition to the transportation procedures listed above, consumers should remain in one area of the bus, if possible.
- ❖ Employees/volunteers that are assigned to a group will remain with that group on the bus.
- ❖ A face count or roll call will be taken immediately after entering and leaving the bus.

In situations where employees transport consumers in non-organization owned/contracted vehicles:

- ❖ Administrators must be notified of all transportation activities.
- ❖ Use the “rule of three” when transporting consumers: At least two adults must transport a single consumer, or at least two consumers must be present if transported by a single adult.
- ❖ Consumers must never be transported without written permission from a parent.
- ❖ Consumers must be transported directly to their destination. No unauthorized stops may be made.
- ❖ An employee must document beginning and ending times and mileage, the names of consumers, and other employees/volunteers who are involved in transportation, purpose of the transportation, and destination.
- ❖ Employees must avoid unnecessary physical contact with consumers.
- ❖ When possible, employees should avoid engaging in sensitive conversations with consumers.

### *Off-Site Activities*

- ❖ Department Director approval is required for all off-site activities.
- ❖ Parental approval is required.
- ❖ Employee-to-consumer ratios must be pre-determined for the activity.
- ❖ Employees, volunteers and consumers must be easily identifiable.
- ❖ Bathroom and locker room procedures must be followed during outing.
- ❖ Transportation procedures must be followed.
- ❖ Supervisors must observe off-site activities at scheduled times and random intervals.

Additional procedures may need to be established in advance based on the location and type of activity (for example, Amusement parks, Water Parks, Arcades, etc.).

### *Overnight Activities*

Overnight stays present unique risks to consumers, volunteers, and employees. They often involve changing clothes, groups of all gender identities and different ages in a more intimate atmosphere than usual, more unstructured activities, and increased supervision demands for employees.

- ❖ All overnight activities must be documented and approved in writing by the Branch Executive Director/Manager.
- ❖ Administrators are expected to regularly and randomly observe overnight activities on a scheduled and periodic basis.
- ❖ The Director should appoint a “lead” employee to supervise the overnight. A meeting with all employees is conducted to discuss the unique risks of overnight trips, unique elements of the specific overnight trips and to review the specific policies and procedures.
- ❖ Provide parents with written information about the overnight activity. All parents must sign a permission slip for their consumers to attend the overnight.
- ❖ Determine the appropriate employee-to-consumer ratios before the event and schedule employees accordingly.
- ❖ Meetings with the group should be hosted in open and observable areas; meetings should not be hosted in employees’ or consumers’ rooms.

### *Overnights Away from the Facility*

- ❖ Overnight stays at private homes are prohibited unless approved by the YMCA leadership.
- ❖ Physical boundaries at the off-site location must be clearly defined and explained to the consumers.
- ❖ Assign each employee to a specific group of consumers to supervise. Each employee should then maintain a role sheet that lists all of the consumers in their group. Head counts and roll checks should be conducted routinely throughout the event.

- ❖ If in a cabin type setting, the employees should be placed in bunks to maximize supervision around the cabin and in a way that decreases the chances of consumers sneaking out (such as by the door).
- ❖ In hotel rooms, assign consumers to rooms based on gender identity and age. Employees should have their own rooms. If employees must share rooms with consumers, they must have their own beds, never be alone with a consumer, and never change in front of consumers.
- ❖ All employees are to be on duty in the halls or cabins at night until an hour after lights out and all rooms are quiet.

### *Youth Sports*

To ensure safety and quality in the various youth sports programs, practices must be monitored and evaluated by a full-time employee who is familiar with policies and procedures.

- ❖ Keep a record. Document your supervision visits. Include information like your arrival and departure times, which youth and parents/guardians were present, and a summary of the information collected. Provide employees with feedback about visits.
- ❖ Vary your observation times. Do not develop a predictable pattern of observation. Drop in at different times each day. Occasionally leave and come back immediately.
- ❖ Supervisors should arrive before employees/volunteers. Check punctuality and the routine that employees/volunteers follow to prepare for the youth to arrive.
- ❖ Survey the physical environment. Is this a suitable location for the activity (e.g. size of area for number of youths, ability to supervise all areas used by youth, landscaping that may inhibit supervision)?
- ❖ Watch activities. Are they planned and organized? Are the employees/volunteers actively involved? Ask to see the schedule of activities and compare what is going on at a given time.
- ❖ Observe bathroom and locker room activities to ensure that the employees are complying with the established policies and procedures.

### *Teen Leadership Program*

Older consumers who participate in teen leadership programs are still consumers participants and not employees/volunteers. Even though they are often given more responsibility, teens in the leadership programs must be provided with guidelines regarding appropriate behavior and then supervised accordingly. In addition, employees/volunteers must understand and recognize these teens are still consumers and not their peers. Follow these guidelines for teen leadership programs:

- ❖ Create a screening process for teen leaders which includes:
  - ❖ A standard application
  - ❖ An interview with behaviorally based interview questions
  - ❖ References (from teachers, counselors, family friends, etc.)

Train teen leaders in their role in programs and on program policies about appropriate and inappropriate interactions. This training should include the following information:

- ❖ Appropriate and inappropriate physical and verbal interactions and the importance of maintaining behavioral boundaries between teen leaders and younger consumers and between teen leaders and employees/volunteers.
- ❖ Prohibiting teen leaders from being one-on-one with consumers.
- ❖ Prohibiting teen leaders from escorting consumers to the bathrooms.
- ❖ Prohibiting teen leaders from assisting consumers with changing their clothes.
- ❖ Monitoring system for teen leaders.
- ❖ Designated employee/volunteer who oversees the teen leadership program and its participants.
- ❖ Teen leaders are required to wear clothing or lanyards that identify them as leaders-in-training and

differentiate them from both employees/volunteers and from younger consumers.

- ❖ Supervisor is required to conduct daily check-ins with teen leaders and their program supervisors.
- ❖ Teen leaders should keep a log documenting their daily activities and any problems they encounter. The program supervisor should review these logs daily.

### *Mentorship Program Activities*

Mentorship programs present unique supervision risks due to the nature of relationship-based programming and extended interaction between adults and consumers. To reduce the risk of abuse, boundary violations, or false allegations, the following supervision and dismissal procedures must be followed at all times:

- ❖ The rule of three must be followed at all times to ensure that no consumers are left alone with any single adult. In instances when it is unavoidable for one-on-one interactions to occur, consumers and adults must always be visible on camera.
- ❖ Mentors are never alone with a child or teen under any circumstances.
- ❖ One-on-one interactions between a mentor and a child or teen are strictly prohibited.
- ❖ All adults remain together until all participants have been dismissed according to program procedures.

### *End-of-Session Procedures (School-Year Mentorship Program)*

- ❖ Children and younger teens must be released only to their parent, guardian, or another individual authorized for pick-up.
- ❖ Mentors and supervising adults remain on site until all participants have departed safely.

### *Teen Program Dismissal Procedures*

- ❖ For middle school and teen programs, direct face-to-face contact with a parent or guardian at pick-up is not always required.
- ❖ At program conclusion, participants are escorted outside by staff and observed entering a vehicle or departing safely.
- ❖ Some teen participants may drive themselves.
- ❖ Teen participants are not permitted to transport other teens unless a signed permission statement is on file from both parents or guardians involved.
- ❖ Mentors and supervising adults remain on site until all participants have safely departed.

### *Supervision and Dismissal During Summer Camp*

- ❖ Participants are signed in and signed out daily.
- ❖ Parents or guardians are not required to enter the building at pick-up.
- ❖ At the conclusion of the program day, participants who are signed out are dismissed and may depart independently, as permitted by their family.
- ❖ Mentors are never alone with a child or teen.
- ❖ One-on-one interactions remain prohibited at all times.

### *Supervision for Consumers with Unique Needs*

The YMCA of the Black Hills makes every effort to provide high-quality experiences for all consumers participating in programs. However, not all programs can meet the needs of all consumers. When the demands placed on employees/volunteers by specific consumers exceed the skills of the employees/volunteers or the scope of the program, accidents or abuse may occur.

We understand each consumer is different and responds differently in certain situations. Through behavior management, we will try preventing problems, using redirection, having clear rules, which are developmentally appropriate, and giving positive reinforcement.

Prior to participating in a YMCA program, parents/guardians must complete a form which inquires about their child's medical and/or behavioral needs.

The YMCA will utilize the following questions to determine if a program fits a consumer's unique needs:

- ❖ Can the YMCA's employees/volunteers adequately supervise this specific consumer without compromising the interactions with other consumers?
- ❖ Has this consumer previously posed a threat to others?
- ❖ Has the YMCA made a solid attempt to meet this consumer's needs while ensuring the safety of others enrolled in the program?
- ❖ Does this consumer pose a risk to the safety and well-being of others?

If YMCA employees answer these questions and conclude the program is not the right program for a particular consumer, YMCA employees will schedule a meeting with the consumer's parents/guardians, caseworker, etc. to discuss the conclusions. The YMCA will try to locate an alternative resource for the family, if possible.

### 3.03 Monitoring Employees/Volunteers at On-Site Programs

Supervisors and administrators will conduct ongoing supervision and monitoring of all consumer programs through scheduled and unannounced observations, employee and consumer interactions, and regular review of program documentation. All observations must be documented, communicated appropriately, and used to promote continual improvement and adherence to consumer safety standards.

# Section 4.00 Responding to & Reporting Abuse

## 4.01 Mandatory Reporting

Under South Dakota law, employees and volunteers of child advocacy organizations are mandated reporters. Accordingly, all YMCA of the Black Hills employees and volunteers all employees/volunteers are considered mandated reporters and are therefore trained in how to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. Employees/volunteers must report any suspected abuse or neglect of consumer – whether on or off YMCA property or whether perpetrated by an employee, a volunteer, or others. Initial reports should occur immediately, or as soon as practical as required by law, after the initial event or disclosure. A person who mistakenly reports suspected abuse is immune from civil or criminal liability if the report was made in good faith and without malice.

The YMCA of the Black Hills is committed to taking every allegation of abuse or misconduct seriously and will fully cooperate with authorities to investigate all cases of alleged abuse or misconduct. All employees/volunteers are expected to fully cooperate with any external investigation by outside authorities or any internal investigation conducted by the Y or by individuals given investigative authority by the Y. Cooperation with investigations includes, but is not limited to:

- ❖ Promptly acknowledging and responding to requests for information.
- ❖ Making oneself available for meetings with investigating officials.
- ❖ Providing full, accurate, and truthful information.
- ❖ Maintaining the confidentiality of information learned or transmitted during the investigation, unless otherwise directed by legal authorities.
- ❖ Preserving all relevant information and documents.

Failure to cooperate with an investigation will result in disciplinary action, up to and including termination of employment or dismissal from volunteer responsibilities at the Y.

### *Confidentiality*

Disclosures may be made on a confidential basis. Protected disclosures and investigatory records will remain confidential to the extent possible and in accordance with investigation procedures.

### *Anonymous Reporting*

This Y is committed to creating an environment where everyone is encouraged to share their concerns and those concerns are taken seriously. To this end, we have partnered with Praesidium to establish a helpline that is available to everyone (employees, volunteers, parents/guardians, consumers, community members, etc.) 24 hours a day, seven days a week, 365 days a year.

### *Praesidium Helpline*

The Praesidium Helpline is a consultation line anyone in the Y can call to discuss observations of inappropriate behaviors, suspicious behaviors, policy violations, instances of consumer-to-consumer sexual activity, and any other abuse prevention questions and issues.

Praesidium Helpline

Call: 855-347-0751

### *What can you expect when you call?*

One of Praesidium's experts will be ready to answer your call and gather any information relevant to your

concern or question. If the matter the caller shares is one deemed to be suspected or known sexual abuse, the caller will be instructed by Praesidium to immediately call the civil authorities.

### *What happens once you get off the call?*

Praesidium's team of risk management experts comprised of social workers, attorneys, and other professionals will staff the concern or situation and develop recommended responses and next steps. Praesidium will then share the concern and the recommendations with stakeholders at the Y.

## 4.02 Responding to Consumer-to-Consumer Sexual Activity

Consumer-to-consumer sexual behaviors can include inappropriate touching, exposing body parts, using sexualized language, making threats of sexual activity, engaging in sexual activity, and similar types of interactions.

### *Employee/Volunteer Response*

If employees or volunteers witness consumer-to-consumer sexual behaviors that are contrary to defined behavioral expectations between consumers, they are instructed to follow these guidelines:

If you observe sexual activity between consumers, you should safely separate them as soon as possible.

- ❖ Calmly explain that such interactions are not permitted and separate the consumers.
- ❖ Notify your supervisor and associate director (if applicable) and parent/guardian (when applicable).
- ❖ Complete the necessary documentation [here](#), including what you observed and how you responded.
- ❖ Follow your supervisor/associate director's instructions regarding notifying the authorities and informing the parents/guardians of the consumers involved.
- ❖ Do not attempt to determine whether the consumer's behavior was "sexual curiosity". There is not a standard definition of what normal sexual curiosity looks like. An external body, such as law enforcement, utilizes criterion to investigate and determine whether the consumer's behavior is sexual curiosity.
- ❖ If the problem is recurring, additional action may be required including not allowing one or both consumers to return to the program.
- ❖ Identify how consumers will be managed or supported to prevent further occurrences of sexual activity (i.e., safety or behavioral plans including additional supervision requirements).

### *Supervisors and Administrators Response*

In the event that a supervisor or administrator receives a report of a consumer's sexualized behavior or consumer-to-consumer sexual activity, they are instructed to follow these guidelines:

- ❖ Meet with the employee or volunteer who reported the sexual activity to gather additional information.
- ❖ Confirm that the consumers involved have been separated or placed under increased supervision.
- ❖ Notify the proper authorities.
- ❖ Review the incident report to confirm it is accurately and thoroughly completed.
- ❖ Meet with parents/guardians of the consumers involved (when applicable).
- ❖ Review the immediate steps taken by the employee or volunteer who initially responded.
- ❖ Determine what additional actions should be taken to ensure there is not a recurrence.
- ❖ In some cases, consumer behavior can be managed through a safety or behavior management plan.
- ❖ Develop a written corrective action or follow-up plan in response to the incident.
- ❖ Based on the information gathered, the following may be required:
  - ❖ Assess the suitability of the program for the consumers involved
  - ❖ Review the need for additional consumer or program supervision
  - ❖ Review the need for revised policies or procedures

- ❖ Review the need for additional employee or volunteer training
- ❖ Review the need for additional consumer education
- ❖ Alert others in the organization

#### 4.03 Reporting of Red-Flag or Inappropriate Behaviors and/or Policy Violations

##### *Employee/Volunteer Response*

In the event that employees or volunteers observe red-flag or inappropriate behaviors (refer to section 2.02) and/or policy violations by other employees or volunteers, the employee/volunteer must do the following:

- ❖ Interrupt the behavior.
- ❖ Report the behavior to a department director or other authority.
- ❖ If you are not comfortable making the report directly, make it anonymously
- ❖ If the report is about a supervisor or administrator, contact the next level of management.
- ❖ Complete an internal report found [on SharePoint](#) but do not conduct an investigation.
- ❖ Keep reporting until the appropriate action is taken.

##### *Supervisors and Administrators Response*

- ❖ In the event that a supervisor or an administrator receives a report of suspicious or inappropriate behaviors or policy violations from an employee, volunteer, consumer, or parent/guardian, the supervisor is instructed to do the following:
  - ❖ Report to the next level supervisor or administrator.
  - ❖ Speak with the employee or volunteer who has been reported.
  - ❖ Review the file of the employee or volunteer to determine if similar complaints were reported.
  - ❖ Determine the appropriate response based on the report. Take into consideration factors such as:
    - ❖ Context of red-flag or inappropriate behavior or policy violation;
    - ❖ Severity of red-flag or inappropriate behavior or policy violation;
    - ❖ History of red-flag or inappropriate behaviors or policy violations; and
    - ❖ Trainability of employee or volunteer.
  - ❖ Document the report on the appropriate form.
- ❖ If at any point in gathering information about a report of red-flag or inappropriate behavior, a concern arises about possible abuse, contact the state authorities and file a report.
- ❖ If appropriate, notify parents/guardians.
- ❖ Advise the person who reported the behavior that the report is being taken seriously. Based on the information gathered, the following may be required:
  - ❖ Increase monitoring or supervision of the employee, volunteer, and/or program.
  - ❖ If policy violations with consumer(s) are confirmed, the employee or volunteer must be subject to disciplinary action up to and including termination and prosecution. Disciplinary action will follow the Progressive Disciplinary Process outlined by the organization.
- ❖ If more information is needed, interview and/or survey other employees and volunteers or consumers.

##### *Organizational Response*

- ❖ After the internal review of the red-flag or inappropriate behaviors or policy violations, determine if system changes are necessary, such as:
  - ❖ Review the need for increased supervision.
  - ❖ Review the need for revised policies or procedures.
  - ❖ Review the need for additional training.

#### 4.04 Employee and Volunteer Response to Allegations or Incidents of Abuse

In addition to reporting to state authorities, employees and volunteers are required to report any suspected or known abuse (see definitions in section 2.03) of consumer perpetrated by employees or volunteers directly to leadership so that immediate and proper steps may be taken to ensure the safety of alleged victims and others who may be at risk. Reports of suspected or known abuse may be made confidentially to the following:

- ❖ Administrators
- ❖ Any member of the CPC (see section 2.01).

#### *Employee/Volunteer Response*

- ❖ If you witness abuse, safely interrupt the behavior immediately.
- ❖ If abuse is disclosed to you, assure the individual disclosing that he or she was correct to tell you.
- ❖ Protect the alleged victim from intimidation, retribution, or further abuse to the extent possible.
- ❖ Immediately report the allegation or incident to the director of your department. If the director of your department is unavailable, immediately report to the CEO. Document a written report for the individual you are reporting to include date, time, those involved, and description of alleged abuse or neglect. Reports may be made confidentially or anonymously. An online report can be submitted here: [Report Abuse Here](#).
- ❖ The director or CEO may assist you in your mandatory reporting duties for cases of consumer abuse. As a mandatory reporter, you are required to report the information immediately to a social services agency.
  - Monday through Friday from 8 am to 5 pm CST (877.244.0864)
  - Contact law enforcement directly outside of these hours.
- ❖ Document the incident and disclose any circumstances causing your suspicion of abuse. State only the facts.
- ❖ Check back to make sure appropriate steps are taken. If not, report again to your supervisor or the designated Y authority.
- ❖ Report to Praesidium Helpline (855-347-0751) for additional support or guidance, as needed.

#### *Supervisors and Administrators Response*

In the event a supervisor or an administrator receives a report of suspicious or inappropriate behaviors, policy violations from another employee/volunteer, incidents or allegations of abuse, or consumer-to-consumer sexual abuse and sexualized behaviors, the supervisor/director is instructed to do the following:

- ❖ First, determine if the consumer is still in danger and if so, take immediate steps to prevent any further harm.
- ❖ If receiving report from employee or volunteer, be sure to verify they have followed mandated reporting requirements or will follow immediately after making internal report. Assure the employee/volunteer that they are doing the right thing in reporting suspected abuse.
- ❖ Gather as much information about the allegation as you can. For example, who made the report, who was allegedly abused, who was the alleged abuser, what was the nature of the alleged abuse, where and when did the alleged abuse occur, etc.
- ❖ Accurately record everything you learn in as much detail as you can. Remember your notes may be read by others. Stick to the facts.
- ❖ Immediately inform any member of the CPC.
- ❖ Contact the appropriate local authorities as indicated by your mandatory reporting procedures. Make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency.
- ❖ If the alleged abuse involves an employee or volunteer, suspend the accused employee/volunteer until the investigation is completed.
- ❖ Contact Human Resources for instruction on required disciplinary action steps.
- ❖ If appropriate, notify parents and/or guardians.
- ❖ Advise the person who reported the behavior that the report is being addressed.

- ❖ Throughout the process, ensure you are maintaining strict confidentiality.

#### *Organizational Response*

- ❖ If more information is needed, interview and/or survey other employees/volunteers or participants.
- ❖ Report to any applicable external licensing or governing bodies.
- ❖ After an allegation of abuse at the YMCA has been made, a report will be inputted to the National Y of the USA via LINK by the CEO.
- ❖ The YMCA will review the need for increased monitoring or supervision of the employee, volunteer, or program.
- ❖ If policy violations with consumers are confirmed, the employee/volunteer must be subject to disciplinary action up to and including termination and prosecution.
- ❖ The YMCA will review the need for revised policies or procedures.
- ❖ The YMCA will review the need for overall additional training.

## Section 5.00 Policy Review and Training

### 5.01 Annual Policy Review and Update Process

The YMCA of the Black Hills is committed to maintaining effective and up-to-date abuse prevention policies. To ensure the continued relevance and effectiveness of these policies, the Y will conduct an annual review to:

- ❖ Ensure the purpose and goals of the policy remain relevant.
- ❖ Evaluate whether the policy should be combined with another policy or rescinded.
- ❖ Confirm that the policy is compliant with current laws and regulations.
- ❖ Identify any necessary changes to improve the effectiveness or clarity of the policy and/or associated procedures.

Any changes to organizational policy manuals and/or procedures resulting from this review will be communicated in writing within seven (7) days of the change. The Y will establish an official mode of communication for disseminating these updates and will ensure that changes are communicated effectively to all employees/volunteers.

### 5.02 Training

Any training necessary to implement policy or procedure changes will be assigned to relevant employees/volunteers. This training is expected to be completed as soon as practicable to ensure that all parties are fully informed and capable of adhering to the updated policies and procedures.

# Consumer Safety Manual Acknowledgment

All employees and volunteers shall confirm that they have read and agree to comply with the YMCA's policies, Code of Conduct, and consumer protection standards by signing this acknowledgment upon hire and annually thereafter. The signed acknowledgement form will be kept in personnel files or in electronic personnel files.

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I acknowledge that I have received a copy of the Consumer Safety Manual / Child Abuse Prevention Policies for the YMCA of the Black Hills. I understand that this manual contains important policies, procedures, expectations, and guidelines designed to protect the safety and well-being of consumers in YMCA programs.

By signing below, I agree to the following:

- ❖ I have received and will read the Consumer Safety Manual in full.
- ❖ I understand that it is my responsibility to become familiar with the contents of the manual and to ask questions if I need clarification.
- ❖ I understand that I am responsible for complying with these policies even if I have not received specific training on every section.
- ❖ This includes, but is not limited to, policies regarding appropriate interactions with consumers, high-risk behaviors, supervision requirements, boundaries, transportation rules, electronic communication, and reporting expectations.
- ❖ I understand my duty to report.
- ❖ I acknowledge that I am required to immediately report any suspected abuse, boundary violations, policy violations, or concerning behaviors according to the reporting procedures outlined in the manual and in accordance with applicable state laws.
- ❖ I understand that failure to follow these policies may result in disciplinary action, up to and including termination of employment or volunteer status.
- ❖ I understand that these policies apply to me at all times while working or volunteering for the YMCA, including on-site, off-site, during virtual interactions, and outside of work hours when interacting with program participants.
- ❖ I understand the YMCA may revise, update, or modify these policies at any time.
- ❖ I agree to comply with all updates and acknowledge that I may be required to sign new versions of this acknowledgement when policies change.
- ❖ I understand that this acknowledgement does not create an employment contract and does not alter my at-will employment or volunteer status.

I acknowledge that compliance with these policies is a condition of my employment/volunteer service.

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Employee/Volunteer Signature

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Date

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Employee/Volunteer Name (Print)